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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

9 1.4G HOLDINGS, LLC, a Nevada limited-liability company;

11 Plaintiff,

V.

12 ELITE FIREWORKS, LLC, a Texas limited
13 liability company;

Defendant.

Case No.: 2:22-CV-2104-RFB-VCF

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE HEARING ON
DEFENDANT'S MOTION TO STAY
DISCOVERY AND JOINT DISCOVERY
PLAN AND SCHEDULE**

(SECOND REQUEST)

Plaintiff 1.4g Holdings, LLC (“Plaintiff” or “1.4g Holdings”), and Defendant Elite Fireworks, LLC (“Defendant” or “Elite”), by and through their respective counsel of record, hereby stipulate and agree to continue the May 2, 2023 hearing on Defendant’s Motion to Stay Discovery (ECF No. 16) and Joint Discovery Plan and Scheduling Order (ECF No. 19) (together, the “Pending Matters”) to May 5, 2023, due to the unavailability of Plaintiff’s counsel on May 2, 2023.

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1 This is the second request, and first stipulation, for continuation of the Pending Matters
2 and is made in good faith and not in an attempt to delay proceedings.

3 Respectfully submitted this 18th day of April, 2023.

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5 GIBSON LEXBURY LLP

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7 PIRKEYBARBER, PLLC

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9 /s/ *J.D. Lowry.*

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16 *Attorneys for Plaintiff*

17 _____
18 /s/ *Christopher M. Weimer*

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21 Vice*)
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24 *Attorney for Defendant*

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IT IS HEREBY ORDERED that the
hearing scheduled for May 2, 2023, is
VACATED, and RESCHEDULED to
2:00 PM, May 5, 2023, in Courtroom
3C.

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

4-19-2023
DATE: _____